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Attorneys for Kevin Long and Millcreek Commercial, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

PATTI KLAIR, ROBERT MYERS, ROBERT
BARNES, ERIC CARNRITE, ELIZABETH
HILL-D'ALESSANDRO, ROBERT
TANNEHILL, DITAS TANNEHILL, JOSE
REMENTERIA, TEENA REMENTERIA,
CHARLES BRAUER, LAURA BRAUER,
KAREN MARION, KATHERINE MADERA,
CARL MCQUEARY, LYNN MCQUEARY,
DONALD PATTERSON, KURTIS TRENT
MANNING, TONY SCHAKER, PATRICK
WHITE, HILDEGARD WHITE, QUEST
REALTY TRUST, SECURE STORAGE
LLC, KURTIS TRENT MANNING LIVING
TRUST,

Plaintiffs,

vs.

KEVIN LONG, MILLCREEK
COMMERCIAL, LLC, COLLIERS
INTERNATIONAL, ANDREW BELL,
TREVOR WEBER, SPENCER TAYLOR,
BLAKE MCDUGAL, SCOTT
RUTHERFORD, EQUITY SUMMIT
GROUP, ELEVATED 1031,

Defendants.

STIPULATED MOTION FOR
EXTENSION OF TIME TO FILE REPLY
IN SUPPOT OF JOINT MOTION TO
CONSOLIDATE RELATED CASES

Case No. 2:23-cv-00407-HCN-CMR

District Judge Howard C. Nielson, Jr.
Magistrate Judge Cecilia M. Romero

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, defendants and plaintiffs in the above-captioned lawsuit, as well as interested parties making an appearance in this matter Kate Grant, Chris Wilson, and Karmen Kasten LLC, through their respective undersigned counsel, hereby stipulate and move the Court to extend the due date through and including June 4, 2024 for the defendants to file a joint reply in support of the Joint Motion to Consolidate Related Cases (Dkt. 56) (the "Motion to Consolidate") in this matter.

Good cause exists for the requested extension where three (3) separate opposition memoranda have been filed. While the opposition memoranda contain similar arguments, there are some discrete issues raised requiring responses from the joint movants. Additionally, due to counsel schedules and the holiday weekend, additional time is required to fully respond to the arguments raised in the opposition memoranda. The time for filing a reply has not passed, and this is the first extension requested. Moreover, the requested extension is for one week, which will not result in any undue delay in the briefing, and a determination by the Court on, the Motion to Consolidate. Accordingly, the parties request the Court grant the Motion.

A copy of the proposed Order Extending Time to File a Reply in Support of Joint Motion to Consolidate Related Cases is attached as Exhibit "A."

DATED this 28th day of May, 2024.

PARR BROWN GEE & LOVELESS

By: /s/ Rodger M. Burge

Bentley J. Tolk

Rodger M. Burge

*Attorneys for Defendants Kevin Long and
Millcreek Commercial, LLC*

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*Attorneys for Interested Parties Chris Wilson,
Kate Grant, and Karmen Kasten LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of May, 2024 a true and correct copy of the foregoing STIPULATED MOTION FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF JOINT MOTION TO CONSOLIDATE RELATED CASES was filed through the Court's CM/ECF system, providing notice to all counsel of record, including counsel for all interested parties making appearances herein. A copy of the Motion was also sent via electronic mail to counsel for the interested parties on this date.

/s/ Rodger M. Burge
Rodger M. Burge